



Department of Toxic Substances Control



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TO: Publicly Owned Treatment Works (POTWs)

SUBJECT: PARTICIPATION IN CALIFORNIA'S MERCURY (HG) ELIMINATION
LEADERSHIP PROGRAM (HELP)

The State of California is inviting POTWs to join with us in seeking the virtual elimination of mercury waste in hospitals by the year 2005 by participating in our Mercury (Hg) Elimination Leadership Program (HELP). Mercury is a neurotoxic, heavy metal that is linked to numerous health effects in wildlife and people. One of the main routes of human exposure to mercury is consumption of contaminated fish. As such, POTWs are coming under increasing pressure to reduce releases of mercury to their receiving waters. Since POTWs can not remove all mercury in wastewater arriving at their plants, pollution prevention to reduce mercury before it enters the plant is essential.

Hospitals are a significant source of mercury arriving at POTWs, contributing 5 -10 percent of the total mercury in wastewater, according to a recent study by the Association of Metropolitan Sewerage Agencies. Mercury enters hospital wastewater from disposal of laboratory chemicals, dental services, and cleanup of broken mercury-containing devices such as thermometers and blood pressure cuffs. By working with hospitals on preventing mercury releases to wastewater, POTWs can actually help mitigate public health impacts.

The purpose of HELP is to reduce releases of mercury from hospitals to all media, including wastewater. HELP is a joint effort of the Department of Toxic Substances Control (DTSC), the Department of Health Services, the United States Environmental Protection Agency Region IX, Hospitals for a Healthy Environment (H2E), California Healthcare Association (CHA), and individual hospitals. We would like California POTWs to also join us. This partnership is creating programs and training to help California hospitals be the national leader in eliminating mercury and mercury-containing waste by 2005. This is a voluntary program.

Attachment 1 of this letter lists the minimum program elements for the hospitals to be considered mercury-free.

Attachment 2 of this letter is a questionnaire for you to indicate your interest in the program and inform us whether you would like to receive materials from us. We would appreciate your input on ways you envision the POTWs working with the hospitals.

We look forward to welcoming your POTW into HELP. If you have any questions, please contact Ms. Mary Kathleen Pride of DTSC's Office of Pollution Prevention and Technology Development at (916) 324-1088 or [<mkpride@dtsc.ca.gov>](mailto:mkpride@dtsc.ca.gov). We look forward to working with you.

*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption.
For a list of simple ways you can reduce demand and cut your energy costs, see our Web-site at www.dtsc.ca.gov.*

ATTACHMENT 1

The following are the minimum requirements for your facility to receive recognition from HELP:

1. Inventory all mercury devices and sources. A complete inventory will include labeling all mercury-containing devices, and preparing and implementing a plan to replace all inventoried devices with non-mercury alternatives where alternatives are available.
2. Replace patient mercury thermometers with non-mercury containing devices.
3. Replace, at a minimum, 75 percent of sphygmomanometers inventoried. Prepare a plan for totally eliminating the remaining devices.
4. Replace, at a minimum, 75 percent of clinical mercury-containing devices (Bougies, Miller Abbott tubes, dilators, etc.). Prepare a checklist of all items that have been replaced and prepare and implement a plan to totally eliminate any remaining devices.
5. Develop and implement a fluorescent tube recycling program.
6. Develop and implement a mercury and alkaline battery collection program.
7. Prepare and put into practice an Environmentally Preferable Purchasing (EPP) statement that bans the purchase of mercury-containing items without prior approval. Training and procedures for the use of the statement must be put in place. The procedure must include who may approve mercury purchases and list acceptable reasons for the purchase. The request to purchase any mercury containing devices should include a plan to manage the mercury safely and to collect all waste.
8. Replace, at a minimum, 75 percent of laboratory chemicals containing mercury. Prepare a plan for total elimination of mercury laboratory chemicals. Replace B5 or Zenkers stain with a non-mercury substitute.
9. Replace, at a minimum, 75 percent of all mercury laboratory thermometers. Complete an inventory of mercury laboratory thermometers. A complete inventory will include labeling all mercury containing thermometers, and preparing and implementing a plan to replace all inventoried devices with non-mercury alternatives where alternatives are available.

ATTENTION ALL PUBLICLY OWNED TREATMENT WORKS (POTWs)

Please check the appropriate responses, provide any relevant information, sign and date the certification, and return this form to the Department of Toxic Substances Control, Office of Pollution Prevention and Technology Development, P2CU – POTW, P.O. Box 806, Sacramento, CA 95812-0806.

My POTW is: _____

Contact Name: _____

Telephone Number: _____

_____ You may post our POTW on your website as a partner in HELP that is working towards the goal of mercury-free hospitals in my region.

_____ I would like to receive program updates by e-mail whenever possible.

My E-mail address is: _____

_____ Send me your CD with mercury verification and elimination tools.

_____ Our POTW would like to help with local involvement. We think we can help by:

_____ We are affected by a mercury Total Maximum Daily Load (TMDL). The water body affected is:

_____ We may be open to negotiating less restrictive mercury limits for hospitals within our service area who meet the goals of HELP.

_____ We may be interested in training on mercury source reduction for hospitals.

_____ We have suggestions for your program: _____

Type/Print Name

Signature/Date